

Chad Ryan Stark  
Name

2738129  
Prison Number

FILED	FILED
ENTERED	FILED ON
COUNSEL/PARTIES OF RECORD	
FEB - 8 2021	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEF

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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Chad Ryan Stark,  
Plaintiff

vs.

State of Nevada,  
Clark County,  
L.V.M.P.D.,  
Officer J. Lucero,  
Detective S. Porter,  
Defendant(s).

**2:21-cv-00220-GMN-BNW**

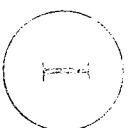
CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

**A. JURISDICTION**

- 1) This complaint alleges that the civil rights of Plaintiff, Chad Ryan Stark,  
(print plaintiff's name)  
who presently resides at 330 S. Casino Center Blvd  
7061 Starwood Dr., were violated by

the actions of the below-named individuals that were directed against Plaintiff at

C.C.D.C. / Las Vegas on the following dates:  
(institution/city where violation occurred)  
9/22/2020, 12/16/2020, and 01/5/2021.  
(Claim 1) (Claim 2) (Claim 3)



**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

- 2) Defendant State of Nevada resides at Las Vegas, N.V. 89101, and is  
(full name of first defendant) (address of first defendant)  
employed as State of Nevada. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting  
under color of law: Mental Anguish, harrassment, false imprisonment and Defamation of Character
- 3) Defendant Clark County resides at Las Vegas, N.V., and is  
employed as The City of. This defendant is sued in his/her  
\_\_\_ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting  
under color of law: mental Anguish, harrassment, false imprisonment and Defamation of Character
- 4) Defendant LVMPD resides at Las Vegas, N.V., and is  
employed as Police Department. This defendant is sued in his/her  
\_\_\_ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting  
under color of law: mental Anguish, harrassment, false imprisonment and Defamation of Character

- 5) Defendant J. Lucero PH#16543 resides at Las Vegas, N.V., and is employed as Police officer. This defendant is sued in his/her ☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: Mental Anguish, Harassment, false imprisonment, and Defamation of Character
- 6) Defendant S. Pater PH#9485 resides at Las Vegas, N.V., and is employed as Police Detective. This defendant is sued in his/her ☒ individual ☒ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: mental Anguish, Harassment, false imprisonment and Defamation of character
- 7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.
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**B. NATURE OF THE CASE**

- 8) Briefly state the background of your case.

A Robbery w/USE Deadly Weapon was committed on or around Sep. 13 2020. El was arrested 9/21, charged with the crime. Released within 24 hours due to lack of evidence. 12/16/2020 El am re-arrested on the same charges with no new evidence. Video from A 7-11 shows me to be innocent yet El have spent 42 days in jail awaiting court dates.

C. CAUSE(S) OF ACTION

CLAIM 1

The following civil rights have been violated: Mental Anguish (caused by intentional infliction or emotional distress) or (negligence of intentional infliction of distress)

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Since my arrest by L.V.M.P.D. and detainment at C.C.D.C. by the state of Nevada, City of Las Vegas in The County of Clark. Based on a ~~False~~ <sup>False</sup> I.D. from Officer J. Lucero PH#16543. And due to the investigating Detective S. Porter PH#9485, seeming to just believe I was guilty based on an assumption and not on the facts. I have been arrested on this same charge(s) twice now where I have spent 42 days locked up for a crime all parties involved know I did not commit. I shouldn't have to be scared to leave my house due to "matching a description". Original definition of Mental Anguish is defined as a compensable injury embracing all forms of mental pain, as opposed to mere physical pain, including deep grief, distress, anxiety & fright. I am currently experiencing all the above. I have once again started taking Phys. meds to which is Lithium & Ziprxa. Arrest dates are 9/21/2020 and 12/16/2020. Charges dismissed 01/27/2021

## CLAIM 2

The following civil rights have been violated: Harassment

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Due to being arrested based upon one officer stating  
he recognized me and no further evidence leading to  
warrants being issued for my arrest. Not once but  
twice 9/21/2020 and 12/16/2020. Clearly I was mistaken  
as records show charges were dismissed on 1/27/2021.  
But the reason they were dropped is because of me  
having tattoo's on my legs to where as the man in  
the video they were saying was me did not. I have  
the full discovery from my interview with Detective  
S. Porter P#4485. From back in September on 9/22/2020  
where I tell her about and show her my legs with  
tattoo's. So how can I still be A suspect 2 months  
latter. That's harassment from The State, City, County  
and the Police department.

CLAIM 3

The following civil rights have been violated: false imprisonment

Supporting Facts: [Include all facts you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Due to being arrested twice for the same charge  
First on 09/21/2020 and again on 12/16/2020. with  
no new evidence and with the investigating Detective  
s. Porter PH985 having all the video evidence  
She needs that shows I am clearly the wrong person  
yet I find myself imprisoned against my will  
at C.C.D.C. in the state of Nevada county of  
Clark, City of Las Vegas by the Las Vegas Metro-  
politan Police Department for 42 days. That  
is false imprisonment all because officer J.  
Lucero PH 16543 makes a false positive I.D. from  
a surveillance photo/video.

The Following Civil Rights have been Violated:

Defamation of Character (libel)

By the State of Nevada, City of Las Vegas, County of Clark, charging me with crimes they have full knowledge of that I did not committ said crimes. Detective S. Porter P#9485 knew back in are interview in september I had tattoos on my legs, but apparently she didn't care because when my Attorney got the same video she I.D. me in the charges get dissmised due to the fact alone. I have the interview transcripts where I am telling her it's not me, it's not me. All she keeping doing is calling me a liar and tells me is all and I quote "Bullshitting her!". Officer J. Lucero P#16543 involvement is where he is showin a picture of A Robbery suspect and immediately states he knows that its "Chad Stark" (me) yet he has supposedly had an interaction with me at the same location at some point or another. Yet here I am today with my character completely and utterly defamed due to this officer and this Detective. Both acting upon under color of Law.

- 9) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? Circle one: Yes or No. If your answer is "Yes," describe each lawsuit. (If more than one, describe the others on an additional page answering the following questions.)

- a) Defendants: \_\_\_\_\_
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 10) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted? Circle one: Yes or No. If your answer is "Yes," describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page answering the following questions.)

**Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:**

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_



**Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:**

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

**Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:**

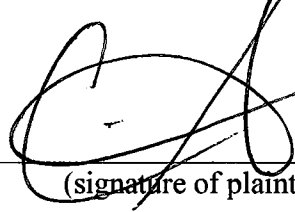
- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (circle one): (1) frivolous;  
(2) malicious; or (3) failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

**D. REQUEST FOR RELIEF**

I believe I am entitled to the following relief: After reviewing the above facts & considering how much I have suffered and future sufferings I am searching for damages in excess of \$1.2 million dollars. For Mental Anguish, Harrassment false imprisonment & defamation of character. I find that to be A Surtiabile amount of monies. Also would like A Pro-Bono attorney as I cant not afford one.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(name of person who prepared or helped  
prepare this complaint if not the plaintiff)

  
\_\_\_\_\_  
(signature of plaintiff)

02/3/2021  
\_\_\_\_\_  
(date)